



June 11, 2010

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**RE: Greenbelt Plan Draft Performance Monitoring Framework Discussion Paper (EBR #010-9407)**

Dear Mr. Taylor,

Thank you for the opportunity to provide comments to inform the development of a performance monitoring framework for the Greenbelt Plan. The following comments are submitted on behalf of Conservation Ontario, which is the network of Ontario's 36 Conservation Authorities (CAs).

### **General Comments**

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1. The monitoring framework should consider a mechanism to incorporate more detailed, and accurate, monitoring information from partners. Many conservation authorities (CAs) undertake a broad spectrum of terrestrial monitoring activities in addition to water quality, fisheries and benthic invertebrate sampling. For example, Conservation Halton's monitoring program includes several Marsh Monitoring Program, Forest Bird Monitoring Program and Ecological Monitoring and Assessment Network Forest Health Monitoring sites throughout its watershed. Its monitoring program has a hierarchical structure similar to the pressure-state-response model being advanced for the Greenbelt. As such, consideration of local case studies where ecosystem change has been detected may elucidate some of the root causes that might also be operating at a regional scale.
2. Additional information is required as to what thresholds of change will be considered significant; consideration of analytical methods is required prior to the finalization of indicators.
3. The outcomes of Ontario Municipal Board, Environmental Review Tribunal and Joint Board hearings related to natural features in the Greenbelt should be included in the monitoring program.

### **Specific Comments**

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4. Sample Indicator #6: It is recommended that consideration be given to utilizing the Municipal Property Assessment Corporation as a data source, as they should have more data than Statistics Canada regarding the total number of new dwellings within the non-settlement areas of the Greenbelt.

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5. Sample Indicator #7: In order for the ANSI indicator to provide an accurate measure of change, the GIS layer requires a thorough update to reflect actual baseline conditions in 2005.
6. Sample Indicator #8: In order for the wetlands indicator to provide an accurate measure of change, the GIS layer requires a thorough update to reflect actual baseline conditions in 2005.
7. Sample Indicator #9: CAs have previously expressed concern with the accuracy of Southern Ontario Land Resource Information System mapping. The South Central Conservation Authorities (SCOCA) Natural Heritage Discussion Group has sent at least one letter to the Ministry of Natural Resources expressing these concerns. As such, the validity of its use in a monitoring framework is questioned. It is proposed that the indicator would monitor “changes” in the lands adjacent to Greenbelt wetlands, but greater specificity is required as to which changes would be considered negative (e.g. paving a former thicket) versus neutral (e.g. natural succession) versus positive (e.g. rehabilitating a parking lot into wetland).
8. Sample Indicator #11: As watershed-based planning agencies, it is argued that CAs would be a much better data source than the Ministry of Environment and the Ministry of Municipal Affairs and Housing with respect to the percentage of watersheds with completed watershed plans/subwatershed plans.

#### **Responses to questions within the discussion paper**

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**Question 1: Section 1.0 describes the limitations of the Greenbelt Plan and its ability to regulate pressures that contribute to matters such as urban sprawl, the fragmentation of agricultural land, and negative impacts on ecological features. As such, it is important to recognize the limitations of the Greenbelt Plan when developing a performance monitoring framework. Do you agree with this approach?**

9. When the Greenbelt Plan is reviewed it should not be done so in isolation, but rather together with other Plans. For example, the Greenbelt Plan should be considered as part of an overall growth management plan, and the limitations of the Plan should be reconciled with the Places to Grow – Growth Plan for the Greater Golden Horseshoe.
10. Certain external pressures should be monitored to ensure the Greenbelt Plan addresses relevant issues that will help determine if/when the Greenbelt Plan should be amended.

**Question 2: Section 2.0 introduces the pressure-state-response (PSR) framework as an effective method to measure and evaluate broad policy issues and programs. Do you agree with the rationale for using a PSR framework in the context of Greenbelt Plan performance monitoring program?**

11. The rationale for using the PSR framework is supported, however, it is cautioned that while this approach illustrates cause and effect and establishes one-to-one linkages, it could lead to over-simplification, and this risk should be addressed within the framework.
12. The state of the environment is a basis for the PSR framework, but it is cautioned that the framework does not address the root cause of the pressures on the Greenbelt. It is argued that by focusing on the state of the environment, only temporary solutions will be considered. Therefore, it is important to review certain applicable external pressures.

**Question 3: Section 3.0 presents four guiding principles that were developed by an inter-ministry working group to guide the development of the performance monitoring framework. Do you agree with these guiding principles?**

13. A layered performance monitoring framework:  
In order to help measure the success of the indicators, it is recommended that data collected by external partners and organizations such as municipalities, Niagara Escarpment Commission, Monitoring the Moraine project and CAs be collected and utilized.
14. Adaptive monitoring:  
The adaptive monitoring provisions within the framework are supported to ensure the process keeps moving forward and new information is integrated along the way. However, long term data is needed to properly assess trends over time so indicators shouldn't be changed too late in the process so that it becomes difficult to acquire the appropriate amount of information, or render early-collected, base-line data irrelevant.
15. Trends:  
Similar monitoring data should be collected on areas outside of the Greenbelt Plan area for this comparison (i.e. for the purpose of comparing trends on and off the Plan area to help determine if trends are isolated or not). Trend data should be collected and compared within the three plan areas of the Greenbelt Plan, to determine success of Oak Ridges Moraine Conservation Plan (ORMCP) relative to policies of the Niagara Escarpment Plan (NEP) relative to policies for Protected Countryside.
16. System level scale:
  - Important that this is recognized, especially for the more geographically specific components of the Oak Ridges Moraine (ORM) and Niagara Escarpment.
  - At the site level, there is limited data and limited capacity to collect data so it may be difficult to have enough data at the site level that will prove useful as it's easier to collect data at a subwatershed and watershed level.
  - CAs on the ORM are currently compiling comparative assessment watershed data that can be shared for this exercise.

**Question 4: Section 3.0 also outlines our goal-based approach to developing performance monitoring indicators using the Greenbelt Plan's broad vision. These policy theme categories are identified in Figure 6. Do you agree with a vision-based approach? Can you identify any additional policy themes that should be included?**

17. 'Landform' should be included as a policy theme, especially as it relates to aggregate extraction on the ORM and Niagara Escarpment.

**Question 5: Section 4.0 provides an overview of the next steps proposed in the Greenbelt Plan Performance Monitoring Framework. Do you agree with these steps as outlined?**

No concerns raised.

**Question 6: Appendix 1 presents a list of preliminary sample indicators and indicator profiles. Do these sample indicators reflect the direction proposed in the draft performance monitoring framework?**

18. Sample indicator #11 will change during this process and once all of the watershed plans are in place it may be more useful to adapt the indicator to reflect qualitative data associated with the watersheds.

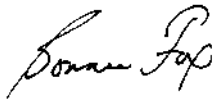
## Question 7: Other suggestions

19. The fact that this is meant to be a monitoring framework for more than just the Greenbelt Plan and is meant to review the effectiveness of the ORMCP and NEP as well should be stated explicitly.
20. The ORMCP, under the heading 'Performance Indicators and Monitoring' (page 78) reads:
- (a) The Ontario government, in consultation with municipalities, shall over time identify performance indicators for monitoring the effectiveness of this Plan.*
- (b) The Ontario government, in partnership with appropriate stakeholders, shall establish a monitoring network to collect, summarize and evaluate performance indicator data to:*
- assess changes in the ecological integrity of the Moraine;*
  - assess the effectiveness of the policies of the Plan in achieving the Plan's vision and objectives;*
  - help identify improvements that would address problems encountered in implementing the Plan.*

Clarity is requested regarding the intent of this Performance Monitoring Framework to fulfill the objectives outlined above. It is unclear whether the indicators will be applied to all three Plan areas (Greenbelt, ORM, Niagara Escarpment).

Thank you again for the opportunity to provide input on the development of a performance monitoring framework for the Greenbelt Plan. If you have any questions regarding these comments please contact Natasha Leahy at (905) 895-0716 ext. 228.

Sincerely,



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- c.c. All Conservation Authority GMs/CAOs  
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